

# **Exhibit E**

**Barber, Hamilton B.**

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**From:** Moore, Mark C.  
**Sent:** Monday, January 24, 2022 8:11 AM  
**To:** Lisle Traywick  
**Cc:** Chris Bryant; Limehouse, Thomas; Christopher Mills; Shedd, Michael; Lambert, Grayson; La'Jessica Stringfellow; Rob Tyson; jmgore@jonesday.com; skenny@jonesday.com; Mathias, Andrew A.; Barber, Hamilton B.; Hollingsworth, Jennifer J.; Wilkins, William W.; Trinkley, Jane; Crum, Liz; Burchstead, Michael; Nicholson, Thomas; Allen Chaney; Antonio Ingram; John Cusick; Leah Aden; Patricia Yan; Raymond Audain; Samantha Osaki; Gryll, Sarah; Somil Trivedi; Stuart Naifeh; Freedman, John A.; Colarusso, Gina; Parente, Michael A.; Diamaduros, Konstantine P; Ricard, Rhett D.; Lipham, Shannon V.; Wells, Erica H.  
**Subject:** Re: [External] RE: SC NAACP v. McMaster: Plaintiffs' Second Set of Interrogatories [IWOV-NPCOL1.FID2240915]

Thanks, Lisle. We need to discuss the issue of privilege as well. Also, before we actually produce documents to each other, we think we need a confidentiality order and Andrew will circulate a proposed order modeled after this district's form order this morning.

We are available tomorrow afternoon after 330 and flexible Wednesday.

Sent from my iPhone

On Jan 23, 2022, at 5:49 PM, Lisle Traywick <ltraywick@robinsongray.com> wrote:

{EXTERNAL EMAIL}

I hope everyone is having a nice weekend. Given that Defendants are serving discovery responses tomorrow and we're basically a month out from trial, we thought it would be beneficial for the group to huddle up to discuss scheduling, depositions, discovery issues, and any other topics necessary to move the case forward. For the sake of efficiency and getting something on the calendar, maybe we just aim to have one or two lawyers from each party present. We have availability Tuesday afternoon and most of Wednesday. Please let us know a time that would best suit the group.

Thanks,

Lisle

<image008.png>

 **VORDMAN CARLISLE TRAYWICK, III ASSOCIATE**

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&lt;image004.jpg&gt;

&lt;image003.jpg&gt; &lt;image005.jpg&gt;

&lt;image006.jpg&gt;

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**From:** Chris Bryant <[chris@boroughsbryant.com](mailto:chris@boroughsbryant.com)>  
**Sent:** Thursday, January 20, 2022 4:42 PM  
**To:** Lisle Traywick <[ltraywick@robinsongray.com](mailto:ltraywick@robinsongray.com)>  
**Cc:** Limehouse, Thomas <[TLMimehouse@governor.sc.gov](mailto:TLMimehouse@governor.sc.gov)>; Moore, Mark C. <[MMoore@nexsenpruet.com](mailto:MMoore@nexsenpruet.com)>; Christopher Mills <[cmills@spero.law](mailto:cmills@spero.law)>; Shedd, Michael <[MShedd@governor.sc.gov](mailto:MShedd@governor.sc.gov)>; Lambert, Grayson <[GLambert@governor.sc.gov](mailto:GLambert@governor.sc.gov)>; La'Jessica Stringfellow <[lstringfellow@robinsongray.com](mailto:lstringfellow@robinsongray.com)>; Rob Tyson <[rtyson@robinsongray.com](mailto:rtyson@robinsongray.com)>; jmgore@jonesday.com; skenny@jonesday.com; Mathias, Andrew A. <[AMathias@nexsenpruet.com](mailto:AMathias@nexsenpruet.com)>; Barber, Hamilton B. <[HBarber@nexsenpruet.com](mailto:HBarber@nexsenpruet.com)>; Hollingsworth, Jennifer J. <[JHollingsworth@nexsenpruet.com](mailto:JHollingsworth@nexsenpruet.com)>; Wilkins, William W. <[BWilkins@nexsenpruet.com](mailto:BWilkins@nexsenpruet.com)>; Trinkley, Jane <[JTrinkley@burr.com](mailto:JTrinkley@burr.com)>; Crum, Liz <[lcrum@burr.com](mailto:lcrum@burr.com)>; Burchstead, Michael <[mburchstead@burr.com](mailto:mburchstead@burr.com)>; Nicholson, Thomas <[tnicholson@elections.sc.gov](mailto:tnicholson@elections.sc.gov)>; Allen Chaney <[achaney@aclusc.org](mailto:achaney@aclusc.org)>; Antonio Ingram <[aingram@naacpldf.org](mailto:aingram@naacpldf.org)>; John Cusick <[jcusick@naacpldf.org](mailto:jcusick@naacpldf.org)>; Leah Aden <[laden@naacpldf.org](mailto:laden@naacpldf.org)>; Patricia Yan <[pyan@aclu.org](mailto:pyan@aclu.org)>; Raymond Audain <[craudain@naacpldf.org](mailto:craudain@naacpldf.org)>; Samantha Osaki <[sosaki@aclu.org](mailto:sosaki@aclu.org)>; Gryll, Sarah <[sarah.gryll@arnoldporter.com](mailto:sarah.gryll@arnoldporter.com)>; Somil Trivedi <[strivedi@aclu.org](mailto:strivedi@aclu.org)>; Stuart Naifeh <[snaifeh@naacpldf.org](mailto:snaifeh@naacpldf.org)>; Freedman, John A. <[John.Freedman@arnoldporter.com](mailto:John.Freedman@arnoldporter.com)>; Colarusso, Gina <[Gina.Colarusso@arnoldporter.com](mailto:Gina.Colarusso@arnoldporter.com)>; Parente, Michael A. <[MParente@nexsenpruet.com](mailto:MParente@nexsenpruet.com)>; Diamaduros, Konstantine P <[KDiamaduros@nexsenpruet.com](mailto:KDiamaduros@nexsenpruet.com)>; Ricard, Rhett D. <[RRicard@nexsenpruet.com](mailto:RRicard@nexsenpruet.com)>; Lipham, Shannon V. <[SVLipham@nexsenpruet.com](mailto:SVLipham@nexsenpruet.com)>; Wells, Erica H. <[EWells@nexsenpruet.com](mailto:EWells@nexsenpruet.com)>  
**Subject:** Re: [External] RE: SC NAACP v. McMaster: Plaintiffs' Second Set of Interrogatories [IWOV-NPCOL1.FID2240915]

Thanks all!



Christopher J. Bryant | Partner

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On Thu, Jan 20, 2022 at 4:07 PM Lisle Traywick <[ltraywick@robinsongray.com](mailto:ltraywick@robinsongray.com)> wrote:

We are too. Many thanks to both of you for the hard work.

<image001.png>

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**From:** Limehouse, Thomas <[TLMimehouse@governor.sc.gov](mailto:TLMimehouse@governor.sc.gov)>

**Sent:** Thursday, January 20, 2022 4:04 PM

**To:** Moore, Mark C. <[MMoore@nexsenpruet.com](mailto:MMoore@nexsenpruet.com)>; Chris Bryant <[chris@boroughsbryant.com](mailto:chris@boroughsbryant.com)>  
**Cc:** Lisle Traywick <[ltraywick@robinsongray.com](mailto:ltraywick@robinsongray.com)>; Christopher Mills <[cmills@spero.law](mailto:cmills@spero.law)>; Shedd, Michael <[MShedd@governor.sc.gov](mailto:MShedd@governor.sc.gov)>; Lambert, Grayson <[GLambert@governor.sc.gov](mailto:GLambert@governor.sc.gov)>; La'Jessica Stringfellow <[lstringfellow@robinsongray.com](mailto:lstringfellow@robinsongray.com)>; Rob Tyson <[rtyson@robinsongray.com](mailto:rtyson@robinsongray.com)>; [jmgore@jonesday.com](mailto:jmgore@jonesday.com); [skenny@jonesday.com](mailto:skenny@jonesday.com); Mathias, Andrew A. <[AMathias@nexsenpruet.com](mailto:AMathias@nexsenpruet.com)>; Barber, Hamilton B. <[HBarber@nexsenpruet.com](mailto:HBarber@nexsenpruet.com)>; Hollingsworth, Jennifer J. <[JHollingsworth@nexsenpruet.com](mailto:JHollingsworth@nexsenpruet.com)>; Wilkins, William W. <[BWilkins@nexsenpruet.com](mailto:BWilkins@nexsenpruet.com)>; Trinkley, Jane <[JTrinkley@burr.com](mailto:JTrinkley@burr.com)>; Crum, Liz <[lcrum@burr.com](mailto:lcrum@burr.com)>; Burchstead, Michael <[mburchstead@burr.com](mailto:mburchstead@burr.com)>; Nicholson, Thomas <[tnicholson@elections.sc.gov](mailto:tnicholson@elections.sc.gov)>; Allen Chaney <[achaney@aclusc.org](mailto:achaney@aclusc.org)>; Antonio Ingram <[aingram@naacpldf.org](mailto:aingram@naacpldf.org)>; John Cusick <[jcusick@naacpldf.org](mailto:jcusick@naacpldf.org)>; Leah Aden <[laden@naacpldf.org](mailto:laden@naacpldf.org)>; Patricia Yan <[pyan@aclu.org](mailto:pyan@aclu.org)>; Raymond Audain <[raudain@naacpldf.org](mailto:raudain@naacpldf.org)>; Samantha Osaki <[sosaki@aclu.org](mailto:sosaki@aclu.org)>; Gryll, Sarah <[sarah.gryll@arnoldporter.com](mailto:sarah.gryll@arnoldporter.com)>; Somil Trivedi <[strivedi@aclu.org](mailto:strivedi@aclu.org)>; Stuart Naifeh <[snaifeh@naacpldf.org](mailto:snaifeh@naacpldf.org)>; Freedman, John A. <[John.Freedman@arnoldporter.com](mailto:John.Freedman@arnoldporter.com)>; Colarusso, Gina <[Gina.Colarusso@arnoldporter.com](mailto:Gina.Colarusso@arnoldporter.com)>; Parente, Michael A. <[MParente@nexsenpruet.com](mailto:MParente@nexsenpruet.com)>; Diamaduros, Konstantine P <[KDiamaduros@nexsenpruet.com](mailto:KDiamaduros@nexsenpruet.com)>; Ricard, Rhett D. <[RRicard@nexsenpruet.com](mailto:RRicard@nexsenpruet.com)>; Lipham, Shannon V. <[SVLipham@nexsenpruet.com](mailto:SVLipham@nexsenpruet.com)>; Wells, Erica H. <[EWells@nexsenpruet.com](mailto:EWells@nexsenpruet.com)>  
**Subject:** RE: [External] RE: SC NAACP v. McMaster: Plaintiffs' Second Set of Interrogatories [IWOV-NPCOL1.FID2240915]

Thanks, Mark and Chris. We are fine with proceeding as Mark indicated.

<image007.jpg>

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**From:** Moore, Mark C. <[MMoore@nexsenpruet.com](mailto:MMoore@nexsenpruet.com)>  
**Sent:** Thursday, January 20, 2022 3:43 PM  
**To:** Chris Bryant <[chris@boroughsbryant.com](mailto:chris@boroughsbryant.com)>  
**Cc:** Lisle Traywick <[ltraywick@robinsongray.com](mailto:ltraywick@robinsongray.com)>; Christopher Mills <[cmills@spero.law](mailto:cmills@spero.law)>; Shedd, Michael <[MShedd@governor.sc.gov](mailto:MShedd@governor.sc.gov)>; Limehouse, Thomas <[TLimehouse@governor.sc.gov](mailto:TLimehouse@governor.sc.gov)>; Lambert, Grayson <[GLambert@governor.sc.gov](mailto:GLambert@governor.sc.gov)>; La'Jessica Stringfellow <[Istringfellow@robinsongray.com](mailto:Istringfellow@robinsongray.com)>; Rob Tyson <[rtyson@robinsongray.com](mailto:rtyson@robinsongray.com)>; [jmgore@jonesday.com](mailto:jmgore@jonesday.com); [skenny@jonesday.com](mailto:skenny@jonesday.com); Mathias, Andrew A. <[AMathias@nexsenpruet.com](mailto:AMathias@nexsenpruet.com)>; Barber, Hamilton B. <[HBarber@nexsenpruet.com](mailto:HBarber@nexsenpruet.com)>; Hollingsworth, Jennifer J. <[JHollingsworth@nexsenpruet.com](mailto:JHollingsworth@nexsenpruet.com)>; Wilkins, William W. <[BWilkins@nexsenpruet.com](mailto:BWilkins@nexsenpruet.com)>; Trinkley, Jane <[JTrinkley@burr.com](mailto:JTrinkley@burr.com)>; Crum, Liz <[lcrum@burr.com](mailto:lcrum@burr.com)>; Burchstead, Michael <[mburchstead@burr.com](mailto:mburchstead@burr.com)>; Nicholson, Thomas <[tnicholson@elections.sc.gov](mailto:tnicholson@elections.sc.gov)>; Allen Chaney <[achaney@aclusc.org](mailto:achaney@aclusc.org)>; Antonio Ingram <[aingram@naacpldf.org](mailto:aingram@naacpldf.org)>; John Cusick <[jcusick@naacpldf.org](mailto:jcusick@naacpldf.org)>; Leah Aden <[laden@naacpldf.org](mailto:laden@naacpldf.org)>; Patricia Yan <[pyan@aclu.org](mailto:pyan@aclu.org)>; Raymond Audain <[raudain@naacpldf.org](mailto:raudain@naacpldf.org)>; Samantha Osaki <[sosaki@aclu.org](mailto:sosaki@aclu.org)>; Gryll, Sarah <[sarah.gryll@arnoldporter.com](mailto:sarah.gryll@arnoldporter.com)>; Somil Trivedi <[strivedi@aclu.org](mailto:strivedi@aclu.org)>; Stuart Naifeh <[snaifeh@naacpldf.org](mailto:snaifeh@naacpldf.org)>; Freedman, John A. <[John.Freedman@arnoldporter.com](mailto:John.Freedman@arnoldporter.com)>; Colarusso, Gina <[Gina.Colarusso@arnoldporter.com](mailto:Gina.Colarusso@arnoldporter.com)>; Parente, Michael A. <[MParente@nexsenpruet.com](mailto:MParente@nexsenpruet.com)>; Diamaduros, Konstantine P <[KDiamaduros@nexsenpruet.com](mailto:KDiamaduros@nexsenpruet.com)>; Ricard, Rhett D. <[RRicard@nexsenpruet.com](mailto:RRicard@nexsenpruet.com)>; Lipham, Shannon V. <[SVLipham@nexsenpruet.com](mailto:SVLipham@nexsenpruet.com)>; Wells, Erica H. <[EWell@nexsenpruet.com](mailto:EWell@nexsenpruet.com)>  
**Subject:** [External] RE: SC NAACP v. McMaster: Plaintiffs' Second Set of Interrogatories [IWOV-NPCOL1.FID2240915]

Chris:

I appreciate your willingness to work with us on these issues—and we agree with this redline version. . I think you should be the filer; unless any of the other defendants have any remaining issues, I think you are good to file.

Best,

Mark

**Mark C. Moore**

Member

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**NEXSEN|PRUET**

**From:** Chris Bryant <[chris@boroughsbryant.com](mailto:chris@boroughsbryant.com)>  
**Sent:** Thursday, January 20, 2022 2:52 PM  
**To:** Moore, Mark C. <[MMoore@nexsenpruet.com](mailto:MMoore@nexsenpruet.com)>  
**Cc:** Lisle Traywick <[ltraywick@robinsongray.com](mailto:ltraywick@robinsongray.com)>; Christopher Mills <[cmills@spero.law](mailto:cmills@spero.law)>; Shedd, Michael <[MShedd@governor.sc.gov](mailto:MShedd@governor.sc.gov)>; Limehouse, Thomas <[TLimehouse@governor.sc.gov](mailto:TLimehouse@governor.sc.gov)>; Lambert, Grayson <[GLambert@governor.sc.gov](mailto:GLambert@governor.sc.gov)>; La'Jessica Stringfellow <[Istringfellow@robinsongray.com](mailto:Istringfellow@robinsongray.com)>; Rob Tyson <[rtysen@robinsongray.com](mailto:rtysen@robinsongray.com)>; [jmgore@jonesday.com](mailto:jmgore@jonesday.com); [skenny@jonesday.com](mailto:skenny@jonesday.com); Mathias, Andrew A. <[AMathias@nexsenpruet.com](mailto:AMathias@nexsenpruet.com)>; Barber, Hamilton B. <[HBarber@nexsenpruet.com](mailto:HBarber@nexsenpruet.com)>; Hollingsworth, Jennifer J. <[JHollingsworth@nexsenpruet.com](mailto:JHollingsworth@nexsenpruet.com)>; Wilkins, William W. <[BWilkins@nexsenpruet.com](mailto:BWilkins@nexsenpruet.com)>; Trinkley, Jane <[JTrinkley@burr.com](mailto:JTrinkley@burr.com)>; Crum, Liz <[lcrum@burr.com](mailto:lcrum@burr.com)>; Burchstead, Michael <[mburchstead@burr.com](mailto:mburchstead@burr.com)>; [tnicholson@elections.sc.gov](mailto:tnicholson@elections.sc.gov); Allen Chaney <[achaney@aclusc.org](mailto:achaney@aclusc.org)>; Antonio Ingram <[aingram@naacpldf.org](mailto:aingram@naacpldf.org)>; John Cusick <[jcusick@naacpldf.org](mailto:jcusick@naacpldf.org)>; Leah Aden <[laden@naacpldf.org](mailto:laden@naacpldf.org)>; Patricia Yan <[pyan@aclu.org](mailto:pyan@aclu.org)>; Raymond Audain <[raudain@naacpldf.org](mailto:raudain@naacpldf.org)>; Samantha Osaki <[sosaki@aclu.org](mailto:sosaki@aclu.org)>; Gryll, Sarah <[sarah.gryll@arnoldporter.com](mailto:sarah.gryll@arnoldporter.com)>; Somil Trivedi <[strivedi@aclu.org](mailto:strivedi@aclu.org)>; Stuart Naifeh <[snaifeh@naacpldf.org](mailto:snaifeh@naacpldf.org)>; Freedman, John A. <[John.Freedman@arnoldporter.com](mailto:John.Freedman@arnoldporter.com)>; Colarusso, Gina <[Gina.Colarusso@arnoldporter.com](mailto:Gina.Colarusso@arnoldporter.com)>; Parente, Michael A. <[MParente@nexsenpruet.com](mailto:MParente@nexsenpruet.com)>; Diamaduros, Konstantine P <[KDiamaduros@nexsenpruet.com](mailto:KDiamaduros@nexsenpruet.com)>; Ricard, Rhett D. <[RRicard@nexsenpruet.com](mailto:RRicard@nexsenpruet.com)>; Lipham, Shannon V. <[SVLipham@nexsenpruet.com](mailto:SVLipham@nexsenpruet.com)>; Wells, Erica H. <[EWells@nexsenpruet.com](mailto:EWells@nexsenpruet.com)>  
**Subject:** Re: SC NAACP v. McMaster: Plaintiffs' Second Set of Interrogatories [IWOV-NPCOL1.FID2240915]

{EXTERNAL EMAIL}

Mark,

I have accepted your changes and included Lisle's. Your recollection of our conversation is correct, and the report now includes language to that effect in track changes. I think that the attached version incorporates everything the parties have discussed; please feel free to accept the changes and file or let me know when you're fine with me filing.

Thank you,

Chris

**Christopher J. Bryant | Partner**

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On Thu, Jan 20, 2022 at 1:55 PM Moore, Mark C. <[MMoore@nexsenpruet.com](mailto:MMoore@nexsenpruet.com)> wrote:

Thanks, Chris I still think we need to see the proposed final version.

Chris, I thought that based on our early discussions, your side was inclined to agree that discovery motions that touched on matters of privilege should not be subject to a five page briefing limitation; if that is still the case, then I think the report should so state. If that is not the case, then I think that we need to add some language noting the specific concern that all defendants have about any limitation other than those in the local rules on briefing issues concerning privilege.

Sent from my iPhone

On Jan 20, 2022, at 1:35 PM, Chris Bryant <[chris@boroughsbryant.com](mailto:chris@boroughsbryant.com)> wrote:

{EXTERNAL EMAIL}

Thanks Mark, Lisle, and everyone who pulled this together.

We are fine with everything as changed, but will keep in Plaintiffs' proposal to limit the length of discovery motions that are not related to privilege issues to 5 pages, exclusive of the caption and signatures, and note Defendants' opposition to the page limit.

If that works, we will get the report filed this afternoon.

Chris

**Christopher J. Bryant | Partner**

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On Thu, Jan 20, 2022 at 11:18 AM Lisle Traywick <[ltraywick@robinsongray.com](mailto:ltraywick@robinsongray.com)> wrote:

The Senate Defendants agree with the House Defendants, as well, but we wanted to flag a few things.

*First, please remove John Gore's name from the list of attendees at the Rule 26(f) conference.*

*Second*, in the proposed schedule, the Court already set the deadlines for pretrial disclosures, motions in limine, and dispositive motions in the scheduling order. Is there still disagreement on those dates?

*Third*, under Section IV.1, we recommend simply revising to say, "The parties have already exchanged initial disclosures."

*Fourth*, we agree with the House Defendants on 10 business days.

*Fifth*, per a call with Chris, I'm going to ask one more time for Plaintiffs to reconsider their position on briefing discovery-related motions. We get that nobody wants to see a magnum opus on the meaning of overbreadth or why a request is unduly burdensome. But legislative privilege is going to be an issue in this case. Respectfully, it is unreasonable to try to impose a five-page limit on either side to brief such an important question. To do so would prejudice all our respective clients, not just Defendants. And that's not even accounting for the other issues that may require addressing in the same discovery motion. We're already agreeing to a quick turnaround on these issues. Can we agree to remove the page limits, too, so we can get this report filed?

Thanks to everyone for their hard work in compiling this report. Please let us know if anyone has questions or concerns about anything above or otherwise.

Best,

Lisle

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<image010.png>

**VORDMAN CARLISLE TRAYWICK, III ASSOCIATE**

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**From:** Moore, Mark C. <[MMoore@nexsenpruet.com](mailto:MMoore@nexsenpruet.com)>  
**Sent:** Wednesday, January 19, 2022 5:31 PM  
**To:** Chris Bryant <[chris@boroughsbryant.com](mailto:chris@boroughsbryant.com)>  
**Cc:** Christopher Mills <[cmills@spero.law](mailto:cmills@spero.law)>; Shedd, Michael <[mshedd@governor.sc.gov](mailto:mshedd@governor.sc.gov)>; Limehouse, Thomas <[tlimelhouse@governor.sc.gov](mailto:tlimelhouse@governor.sc.gov)>; Lambert, Grayson <[glambert@governor.sc.gov](mailto:glambert@governor.sc.gov)>; La'Jessica Stringfellow <[lstringfellow@robinsongray.com](mailto:lstringfellow@robinsongray.com)>; Rob Tyson <[rtyson@robinsongray.com](mailto:rtyson@robinsongray.com)>; Lisle Traywick <[ltraywick@robinsongray.com](mailto:ltraywick@robinsongray.com)>; jmgore@jonesday.com; [skenny@jonesday.com](mailto:skenny@jonesday.com); Mathias, Andrew A. <[AMathias@nexsenpruet.com](mailto:AMathias@nexsenpruet.com)>; Barber, Hamilton B. <[HBarber@nexsenpruet.com](mailto:HBarber@nexsenpruet.com)>; Hollingsworth, Jennifer J. <[JHollingsworth@nexsenpruet.com](mailto:JHollingsworth@nexsenpruet.com)>; Wilkins, William W. <[BWilkins@nexsenpruet.com](mailto:BWilkins@nexsenpruet.com)>; Trinkley, Jane <[jtrinkley@burr.com](mailto:jtrinkley@burr.com)>; Crum, Liz <[lcrum@burr.com](mailto:lcrum@burr.com)>; Burchstead, Michael <[mburchstead@burr.com](mailto:mburchstead@burr.com)>; [tnicholson@elections.sc.gov](mailto:tnicholson@elections.sc.gov); Allen Chaney <[achaney@aclusc.org](mailto:achaney@aclusc.org)>; Antonio Ingram <[aingram@naacpldf.org](mailto:aingram@naacpldf.org)>; John Cusick <[jcusick@naacpldf.org](mailto:jcusick@naacpldf.org)>; Leah Aden <[laden@naacpldf.org](mailto:laden@naacpldf.org)>; Patricia Yan <[pyan@aclu.org](mailto:pyan@aclu.org)>; Raymond Audain <[raudain@naacpldf.org](mailto:raudain@naacpldf.org)>; Samantha Osaki <[sosaki@aclu.org](mailto:sosaki@aclu.org)>; Gryll, Sarah <[sarah.gryll@arnoldporter.com](mailto:sarah.gryll@arnoldporter.com)>; Somil Trivedi <[strivedi@aclu.org](mailto:strivedi@aclu.org)>; Stuart Naifeh <[snaifeh@naacpldf.org](mailto:snaifeh@naacpldf.org)>; Freedman, John A. <[John.Freedman@arnoldporter.com](mailto:John.Freedman@arnoldporter.com)>; Colarusso, Gina <[Gina.Colarusso@arnoldporter.com](mailto:Gina.Colarusso@arnoldporter.com)>; Parente, Michael A. <[MParente@nexsenpruet.com](mailto:MParente@nexsenpruet.com)>; Diamaduros, Konstantine P <[KDiamaduros@nexsenpruet.com](mailto:KDiamaduros@nexsenpruet.com)>; Ricard, Rhett D. <[RRicard@nexsenpruet.com](mailto:RRicard@nexsenpruet.com)>; Lipham, Shannon V. <[SVLipham@nexsenpruet.com](mailto:SVLipham@nexsenpruet.com)>; Wells, Erica H. <[EWells@nexsenpruet.com](mailto:EWells@nexsenpruet.com)>  
**Subject:** RE: SC NAACP v. McMaster: Plaintiffs' Second Set of Interrogatories [IWOV-NPCOL1.FID2240915]

Chris:

I have attached my own redline.—and my changes show up in blue. I have conformed the due date of defendant's expert reports with the Court's scheduling order, as our initial reports are due on Feb. 1, not Feb. 4—although if you want to agree the Court should give us those three extra days, we are happy to consent to an amendment of the scheduling order LOL.

I also see that you deleted the word "business" in Paragraph 4(a) and I have added it back in. As previously discussed, House defendants agree to provide discovery responses within 10 **business** days of the receipt of the request, which is substantially less than the time allocated in the rule—but we do not agree to provide those responses within 10 calendar days and have previously so indicated. I believe the other defendants agree with me here. I am happy to discuss this further if you would like—but we do not agree to your proposed edit.

I have copied five of our associates who will be making appearances in this case shortly (I think two filed notices today) and would ask that you include them in all correspondence.

Best,

Mark

**Mark C. Moore**

Member

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**From:** Chris Bryant <[chris@boroughsbryant.com](mailto:chris@boroughsbryant.com)>  
**Sent:** Tuesday, January 18, 2022 6:12 PM  
**To:** Moore, Mark C. <[MMoore@nexsenpruet.com](mailto:MMoore@nexsenpruet.com)>  
**Cc:** Christopher Mills <[cmills@spero.law](mailto:cmills@spero.law)>; Shedd, Michael <[mshedd@governor.sc.gov](mailto:mshedd@governor.sc.gov)>; Limehouse, Thomas <[tlimelhouse@governor.sc.gov](mailto:tlimelhouse@governor.sc.gov)>; Lambert, Grayson <[glambert@governor.sc.gov](mailto:glambert@governor.sc.gov)>; [Istringfellow@robinsongray.com](mailto:Istringfellow@robinsongray.com); Rob Tyson <[rtyson@robinsongray.com](mailto:rtyson@robinsongray.com)>; Lisle Traywick <[ltraywick@robinsongray.com](mailto:ltraywick@robinsongray.com)>; [jmgore@jonesday.com](mailto:jmgore@jonesday.com); [skenny@jonesday.com](mailto:skenny@jonesday.com); Mathias, Andrew A. <[AMathias@nexsenpruet.com](mailto:AMathias@nexsenpruet.com)>; Barber, Hamilton B. <[HBarber@nexsenpruet.com](mailto:HBarber@nexsenpruet.com)>; Hollingsworth, Jennifer J. <[JHollingsworth@nexsenpruet.com](mailto:JHollingsworth@nexsenpruet.com)>; Wilkins, William W. <[BWilkins@nexsenpruet.com](mailto:BWilkins@nexsenpruet.com)>; Trinkley, Jane <[jtrinkley@burr.com](mailto:jtrinkley@burr.com)>; Crum, Liz <[lcrum@burr.com](mailto:lcrum@burr.com)>; Burchstead, Michael <[mburchstead@burr.com](mailto:mburchstead@burr.com)>; [tnicholson@elections.sc.gov](mailto:tnicholson@elections.sc.gov); Allen Chaney <[achaney@aclusc.org](mailto:achaney@aclusc.org)>; Antonio Ingram <[aingram@naacpldf.org](mailto:aingram@naacpldf.org)>; John Cusick <[jcusick@naacpldf.org](mailto:jcusick@naacpldf.org)>; Leah Aden <[laden@naacpldf.org](mailto:laden@naacpldf.org)>; Patricia Yan <[pyan@aclu.org](mailto:pyan@aclu.org)>; Raymond Audain <[raudain@naacpldf.org](mailto:raudain@naacpldf.org)>; Samantha Osaki <[sosaki@aclu.org](mailto:sosaki@aclu.org)>; Gryll, Sarah <[sarah.gryll@arnoldporter.com](mailto:sarah.gryll@arnoldporter.com)>; Somil Trivedi <[strivedi@aclu.org](mailto:strivedi@aclu.org)>; Stuart Naifeh <[snaifeh@naacpldf.org](mailto:snaifeh@naacpldf.org)>; Freedman, John A. <[John.Freedman@arnoldporter.com](mailto:John.Freedman@arnoldporter.com)>; Colarusso, Gina <[Gina.Colarusso@arnoldporter.com](mailto:Gina.Colarusso@arnoldporter.com)>  
**Subject:** Re: SC NAACP v. McMaster: Plaintiffs' Second Set of Interrogatories [IWOV-NPCOL1.FID2240915]

{EXTERNAL EMAIL}

All:

Please find attached a redlined 26(f) report. We accepted all suggested changes, updated to reflect that certain discovery exchanges have taken place, and noted one final point of disagreement that we're happy to have the court address. If everything looks good, we will get this on file.

Chris

Christopher J. Bryant | Partner

**BOROURHS BRYANT, LLC**

1122 Lady Street, Suite 208 | Columbia, SC 29201

E: [chris@boroughsbryant.com](mailto:chris@boroughsbryant.com) | C: 843.779.5444

On Fri, Jan 14, 2022 at 10:56 AM Moore, Mark C. <[MMoore@nexsenpruet.com](mailto:MMoore@nexsenpruet.com)> wrote:

All:

A redline of the 26(f) report is attached that conforms to the Court's scheduling order is attached for your review.

Best,

Mark

**From:** Chris Bryant <[chris@boroughsbryant.com](mailto:chris@boroughsbryant.com)>  
**Sent:** Thursday, January 13, 2022 6:06 PM  
**To:** Christopher Mills <[cmills@spero.law](mailto:cmills@spero.law)>; Shedd, Michael <[mshedd@governor.sc.gov](mailto:mshedd@governor.sc.gov)>; Limehouse, Thomas <[tlimelhouse@governor.sc.gov](mailto:tlimelhouse@governor.sc.gov)>; Lambert, Grayson <[ggrayson@governor.sc.gov](mailto:ggrayson@governor.sc.gov)>; [lstringfellow@robinsongray.com](mailto:lstringfellow@robinsongray.com); Rob Tyson <[rtyson@robinsongray.com](mailto:rtyson@robinsongray.com)>; Lisle Traywick <[ltraywick@robinsongray.com](mailto:ltraywick@robinsongray.com)>; [jmgore@jonesday.com](mailto:jmgore@jonesday.com); [skenny@jonesday.com](mailto:skenny@jonesday.com); Mathias, Andrew A. <[AMathias@nexsenpruet.com](mailto:AMathias@nexsenpruet.com)>; Barber, Hamilton B. <[HBarber@nexsenpruet.com](mailto:HBarber@nexsenpruet.com)>; Hollingsworth, Jennifer J. <[JHollingsworth@nexsenpruet.com](mailto:JHollingsworth@nexsenpruet.com)>; Moore, Mark C. <[MMoore@nexsenpruet.com](mailto:MMoore@nexsenpruet.com)>; Wilkins, William W. <[BWilkins@nexsenpruet.com](mailto:BWilkins@nexsenpruet.com)>; Trinkley, Jane <[jtrinkley@burr.com](mailto:jtrinkley@burr.com)>; Crum, Liz <[lcrum@burr.com](mailto:lcrum@burr.com)>; Burchstead, Michael <[mburchstead@burr.com](mailto:mburchstead@burr.com)>; [tnicholson@elections.sc.gov](mailto:tnicholson@elections.sc.gov)  
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<[pyan@aclu.org](mailto:pyan@aclu.org)>; Raymond Audain <[raudain@naacpldf.org](mailto:raudain@naacpldf.org)>; Samantha Osaki <[sosaki@aclu.org](mailto:sosaki@aclu.org)>; Gryll, Sarah <[sarah.gryll@arnoldporter.com](mailto:sarah.gryll@arnoldporter.com)>; Somil Trivedi <[strivedi@aclu.org](mailto:strivedi@aclu.org)>; Stuart Naifeh <[snaifeh@naacpldf.org](mailto:snaifeh@naacpldf.org)>; Freedman, John A. <[John.Freedman@arnoldporter.com](mailto:John.Freedman@arnoldporter.com)>; Colarusso, Gina <[Gina.Colarusso@arnoldporter.com](mailto:Gina.Colarusso@arnoldporter.com)>

**Subject:** SC NAACP v. McMaster: Plaintiffs' Second Set of Interrogatories

{EXTERNAL EMAIL}

Dear Counsel:

Attached please find Plaintiffs' Second Set of Interrogatories.

Thank you,

Chris

**Christopher J. Bryant | Partner**

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